

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**BRADLEY LANE CROFT(1),**

Defendant.

**NO: SA-18-CR-603-DAE**

**DEFENDANT'S SECOND AMENDED EXHIBIT LIST**

<b>Exh.#</b>	<b>Description</b>	<b>Marked</b>	<b>Offered</b>	<b>Admitted</b>	<b>Witness</b>
<b>1</b>	Animal Control Services (ACS) Records Dogs Seized from 15329 Tradesman				
<b>2-A</b>	Emails Croft to Glasgow- Training Locations				
<b>2-B</b>	Emails Croft, Glasgow & Santos-Permission Santos				
<b>2-C</b>	Emails Croft & Glasgow-Exemption				
<b>2-D</b>	Email Glasgow & Santos-Extension Request				
<b>2-E</b>	Email Croft & Glasgow-Application Changes				
<b>6-F</b>	Emails Croft & Glasgow Supplementing Application				
<b>2-G</b>	Emails Glasgow & Croft-Requirements				
<b>2-H</b>	Email Croft & Glasgow-Lack of Uniformity				
<b>2-I</b>	Email Croft to Glasgow-Media Coverage				
<b>2-J</b>	Email Croft to Glasgow- Starmark				
<b>3-A</b>	Photograph of Front of 15329 Tradesman				
<b>3-B</b>	Photograph of North Side of 15329 Tradesman				

<b>3-C</b>	Photo of South Side of 15329 Tradesman				
<b>3-D</b>	Photograph of Gated Entrance of 15329 Tradesman				
<b>3-E</b>	Photograph of Trailer Side				
<b>3-F</b>	Photograph of Kennels 15329 Tradesman				
<b>3-G</b>	Photograph of Trailer Front				
<b>3-H</b>	Photograph of Truck & Flatbed Trailer				
<b>3-I</b>	Photograph of Truck & UK9 Trailer				
<b>3-J</b>	Photograph of Trailer R.V. and Trucks				
<b>3-K</b>	Photograph of Kennels & UK9 Trailer Side				
<b>3-L</b>	Photograph of Kennels & UK9 Trailer Front				
<b>3-M</b>	Photograph of R.V. Front.				
<b>3-N</b>	Photograph of Trailer Entrance				
<b>3-O</b>	Photograph of Rear Trailer Area				
<b>3-P</b>	Photograph of Close-up View Rear Trailer Area				
<b>3-Q</b>	Photograph of R.V. Hook Up				
<b>3-R</b>	Photograph of Trailer Interior				
<b>4-A</b>	Photograph of Hallway Tradesman				
<b>4-B</b>	Photograph of Room B Tradesman				
<b>4-C</b>	Photograph of Ceiling and Floor Room B Tradesman				
<b>4-D</b>	Photograph of Hallway Work Tradesman				
<b>4-E</b>	Photograph of Construction Tradesman				
<b>4-F</b>	Photograph of Construction Room F				
<b>4-G</b>	Photograph of Desk Wheelbarrow Room F				
<b>4-H</b>	Photograph of Classroom Tradesman				
<b>4-I</b>	Photograph of Classroom & Door Tradesman				

<b>4-J</b>	Photograph of Room H Tradesman				
<b>4-K</b>	Photograph of Hallway Tradesman Classrooms				
<b>4-L</b>	Photograph of Classroom K Tradesman				
<b>4-M</b>	Photograph of Carpet Removal Tradesman				
<b>4-N</b>	Photograph of Work on Floor Tradesman				
<b>4-O</b>	Photograph of Trim and Wiring Tradesman				
<b>4-P</b>	Photograph of Copier Room Tradesman				
<b>4-Q</b>	Photograph of Repairs Copier Room Tradesman				
<b>4-R</b>	Photograph of Trim Removed Tradesman				
<b>4-S</b>	Photograph of Restroom Repair Tradesman				
<b>4-T</b>	Photograph of Tools at Tradesman				
<b>5</b>	Canyon Lake Animal Shelter Records				
<b>6</b>	Lawrenz Payment				
<b>7</b>	Photograph Underwood				
<b>8</b>	Photograph Underwood and Nunez				
<b>9-A</b>	Title 2009 Yamaha Jet Ski				
<b>9-B</b>	Title 2016 Yamaha Jet Ski				
<b>10</b>	NBC News Story Madison PD K9 Jaco				
<b>11</b>	Pictures Depicting Cooks Lifestyle				
<b>12</b>	Cook trip to Wyndham San Jose 20180329				
<b>13</b>	Bank of America Universal K9 Inc statement July 2017				
<b>14</b>	Whatsapp conversation Ric with female trip to Costa Rica				

<b>15</b>	Text Rick booking prostitution 20180517				
<b>16</b>	texts Rick-Wes Clark discussing course options 20180614				
<b>17</b>	texts Rick-Villareal re schedule, course, details July 2018				
<b>18</b>	FBI Travel log Cook				
<b>19</b>	Transaction 10K to Ancira for Richard Cook 20161202				
<b>20</b>	Assortment Cook travel bookings, photos, tax info				
<b>21</b>	Brag rec. ltr. Brad-Boots-Chain-Ltr. Keeling from Bragg 20141124				
<b>22</b>	6 Western Union Money Orders 1K for truck				
<b>23</b>	2017 Dodge Ram for Cook transaction				
<b>24</b>	FCS Vendor file Request form				
<b>25</b>	Ltrs. Re termination of students Cook, Ltr to Coburn Cook				
<b>26</b>	texts exchange Cook-Cameron re tasking Cameron to call vets April to July 2018				
<b>27</b>	Imessage to Cook to call best containers 20180405				
<b>28</b>	Text exchange Cook discussing insurance policy for UK9 April May 2018				
<b>29</b>	Message to Cook re being HIS tenant at tradesman 20190629				
<b>30</b>	Statement of Richard Cook				
<b>31</b>	Email Cook-Ward-Croft re promotion for UK9 May 2017				
<b>32</b>	Cook MOI 20180801				
<b>33</b>	Text exchange Rick-Lilly re money, work, UK9 info				
<b>34</b>	Ltrs. Re. students terminated and ltr. To Palsek referenced in #67				
<b>35</b>	Cook Credit Debit Cards plus Spanish language hospital card				
<b>36</b>	Wells Fargo Act. #7869 Claim 20180412 and wire transfer picture				

<b>37</b>	Pictures Cook material goods- lifestyle				
<b>38-A</b>	Cook counting money video				
<b>38-B</b>	Cook touring truck with cash on passenger seat				
<b>38-C</b>	Cook touring truck with cash on passenger seat v2				
<b>38-D</b>	Cook material items				
<b>38-E</b>	Cook Driving truck to house IMG_0548				
<b>39</b>	Money transfer Documentation Cook				
<b>40</b>	Money Order to Ancira for UK9 Cook for 10K 20161202				
<b>41</b>	BA Card in name of UK9 Richard Cook for Act. #7217				
<b>42</b>	Coburn email to Croft 20151104				
<b>43</b>	Peek Stephen FD302 20180606 Pages from Croft Case File-2				
<b>44</b>	Emails from Croft to Paladino				
<b>45</b>	Jevning Pages from 50143-2				
<b>46</b>	Email from Coburn to Bean 50086				
<b>47</b>	KSAT News Article with Nunez				
<b>48</b>	Nunez and Underwood dining				
<b>49</b>	Keeling Bragg Teaching UK9 Class				
<b>50</b>	Group Picture 20150419				
<b>51</b>	Wes Keeling UK9 Business Card.				
<b>52</b>	Keeling email to Croft with Resume				
<b>53</b>	Wes Resume 2				
<b>54</b>	Keeling Wesley VA-OIG interview transcript				

55	Keeling Croft Dog Tracking				
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Respectfully submitted,

/S/ Thomas Joseph McHugh

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### CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of September, 2019, I electronically filed the foregoing Exhibit List with the Clerk of Court using the CM/ECF system which will send notification of such filing to **Greg Surovic and Fidel Esparza**, Assistant United States Attorney, San Antonio Division, Western District of Texas.

/s/ Thomas Joseph McHugh  
THOMAS JOSEPH MCHUGH